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Chapter 9 Counsel

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE  
DISTRICT, dba TULARE REGIONAL  
MEDICAL CENTER,

Debtor.

CASE NO. 17-13797

Chapter 9

HEALTHCARE CONGLOMERATE  
ASSOCIATES, LLC,

Plaintiff,

v.

TULARE LOCAL HEALTHCARE  
DISTRICT, dba TULARE REGIONAL  
MEDICAL CENTER; DOES 1 through  
20,

Defendants.

Adv. No.: 17-01095

DC NO.: OHS-1

**STIPULATION TO CONTINUE HEARINGS  
AND RESPONSE DATES ON MOTION  
FOR REMAND OF LAWSUIT TO STATE  
COURT PURSUANT TO 28 U.S.C. §  
1452(b); MOTION TO DISMISS  
COUNTERCLAIM AGAINST HCCA OR IN  
THE ALTERNATIVE STRIKE PORTIONS  
THEREOF; MOTION TO DISMISS  
COUNTERCLAIM AGAINST HCCA OR IN  
THE ALTERNATIVE STRIKE PORTIONS  
THEREOF AND ORDER THEREON**

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RECEIVED

February 16, 2018

CLERK, U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
0006223420

Hearings and Response Dates

1 IT IS HEREBY STIPULATED AND AGREED by and between Healthcare  
2 Conglomerate Associates, LLC and Tulare Local Healthcare District, by counsel, as  
3 follows.

4 1. On December 28, 2017 Tulare Local Healthcare District removed to this  
5 court an action ("Removed Action") that had been filed in the Superior Court for the  
6 County of Los Angeles.

7 2. On January 24, 2018 Healthcare Conglomerate Associates, LLC filed a  
8 Motion for Remand of Lawsuit to State Court Pursuant to 28. U.S.C. § 1452(b), D.C. No.  
9 OHS-1, which is set for hearing on February 28, 2018 at 1:30 p.m.

10 3. On January 29, 2018 Healthcare Conglomerate Associates, LLC filed a  
11 Motion to Dismiss Counterclaim Against HCCA or in the Alternative Strike Portions  
12 Thereof, D.C. No. OHS-2, and Motion to Strike Portions of Answer of Tulare Local  
13 Healthcare District dba Tulare Regional Medical Center, D.C. No. OHS-3, which are  
14 each set for hearing on March 12, 2018 at 10:30 a.m.

15 4. The parties have discussed these matters and agree as follows:

16 a. The hearing on the Motion to Remand of Lawsuit to State Court  
17 Pursuant to 28. U.S.C. § 1452(b) will be continued to March 12, 2018 at 10:30 a.m.  
18 Tulare Local Healthcare District's response to such Motion shall be due on February 28,  
19 2018 and the reply of Healthcare Conglomerate Associates, LLC shall be due March 5,  
20 2018.

21 b. The hearings on the Motion to Dismiss Counterclaim Against HCCA  
22 or in the Alternative Strike Portions Thereof and Motion to Strike Portions of Answer of  
23 Tulare Local Healthcare District dba Tulare Regional Medical Center will be continued  
24 to the Court's Bakersfield calendar on April 5, 2018 at 11:00 a.m., the response of  
25 Tulare Local Healthcare District shall be due March 22, 2018 and any reply shall be due  
26 on March 29, 2018.

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1           5.     The parties stipulate and agree to entry of a court order approving this  
2 stipulation.

3  
4 IT IS SO STIPULATED.

5 KLEIN, DeNATALE, GOLDNER, ROSENLIB  
6 & KIMBALL LLP; and

7 ORRICK, HERRINGTON & SUTCLIFFE LLP

8 By: 

9 Marc A. Levinson, Attorneys for  
10 Healthcare Conglomerate Associates, LLC


11 WALTER WILHELM LAW GROUP

12  
13 By: 

14 Riley C. Walter, Attorneys for  
15 Tulare Local Healthcare District

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24  
25 Dated: Feb 20, 2018

By the Court

26   
27 René Lastreto II, Judge  
28 United States Bankruptcy Court